



U.S. Department of Justice

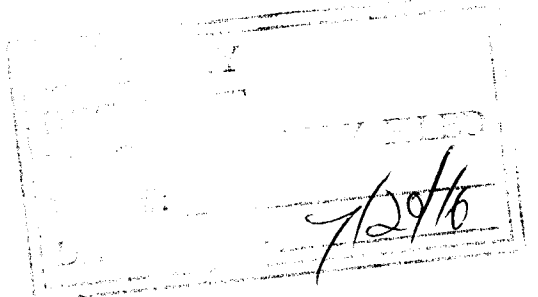
United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 18, 2016

BY EMAIL

Hon. Jed S. Rakoff
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007
RakoffNYSDCchambers@nysd.uscourts.gov



Re: *ACLU v. Admin. for Children & Families*, 16 Civ. 1987 (JSR)

Dear Judge Rakoff:

I write respectfully on behalf of both parties pursuant to the Court's order of May 16, 2016, to provide a status report to the Court regarding this FOIA case, and to propose further deadlines.

The Department of Health and Human Services, Administration for Children and Families (the "Government") has now completed its productions of records responsive to the ACLU's FOIA request, and the ACLU has provided the Government with a list of withholdings for which it requests a draft *Vaughn* index.

The parties propose that the Government provide a draft *Vaughn* index to the ACLU by August 8, 2016, after which the parties will work diligently to resolve outstanding disputes regarding the Government's withholdings, so as to avoid unnecessary litigation. The parties propose that they provide another status report to the Court by August 29, 2016, in which the parties will notify the Court whether summary judgment motions will be necessary and, if so, propose a briefing schedule, or, if summary judgment motions are not necessary, propose a schedule for the parties to address any issues regarding attorney's fees.

→ SO ORDERED

JSDJ

7-18-16

We thank the Court for its consideration of this matter.

Respectfully,

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Defendant

by: /s/ Elizabeth Tulis
ELIZABETH TULIS
Assistant United States Attorney
(212) 637-2725
elizabeth.tulis@usdoj.gov

cc: Brigitte Amiri
Brian Hauss
Attorneys for Plaintiff